



Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Carolyn A. Dye (SBN 97527) 15030 Ventura Boulevard Suite 527 Sherman Oaks, CA 91403 Telephone: 818/287-7003 Facsimile: 323/987-5763 Email: trustee@cadye.com  Chapter 7 Trustee  <input type="checkbox"/> Individual appearing without attorney <input type="checkbox"/> Attorney for:	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT</b> <b>CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b> 	
In re:  MAUREEN C. REDMOND    Debtor(s).	CASE NO.: 2:21-bk-10360-NB CHAPTER: 7   <b>NOTICE OF SALE OF ESTATE PROPERTY</b>

<b>Sale Date:</b> 03/29/2022	<b>Time:</b> 11:00 am
<b>Location:</b> 255 East Temple Street, Courtroom 1545, Los Angeles, CA 90012	

**Type of Sale:** ☒ Public ☐ Private **Last date to file objections:** \_\_\_\_\_

**Description of property to be sold:**

Real property located at 12808 Greene Avenue, Los Angeles, CA 90066  
APN: 4223-014-023

**Terms and conditions of sale:**

Sales price is \$1,350,000, all cash at closing. See the Notice of Hearing is attached hereto as Exhibit A.

**Proposed sale price:** \$ 1,350,000.00 \_\_\_\_\_

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**Overbid procedure (if any):**

First overbid will be \$1,360,000, with increments of \$5,000 thereafter. See details in the attached Notice.

**If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:**

Sale hearing date: March 29, 2022 at 11:00 a.m. in Courtroom 1545 at 255 East Temple Street, Los Angeles, CA 90012

**Contact person for potential bidders (include name, address, telephone, fax and/or email address):**

Carolyn A. Dye  
15030 Ventura Blvd.,  
Suite 527  
Sherman Oaks, CA 91403  
Telephone: 818/287-7003  
Facsimile: 323/987-5763  
Email: trustee@cadye.com

Date: 03/02/2022

**EXHIBIT A**

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1 Carolyn A. Dye (SBN 97527)  
15030 Ventura Boulevard,  
2 Suite 527  
Sherman Oaks, California 91403  
3 Phone: 818/287-7003  
Fax: 323/987-5763  
4 Email: trustee@cadye.com

5 Chapter 7 Trustee

6  
7 UNITED STATES BANKRUPTCY COURT  
8 CENTRAL DISTRICT OF CALIFORNIA  
9 LOS ANGELES DIVISION

10  
11 In re:  
12 MAUREEN C. REDMOND,

13  
14 Debtor.

Case No.: 2:21-bk-10360-NB  
Chapter 7

[Honorable Neil W. Bason]

15 NOTICE OF TRUSTEE'S MOTION FOR  
16 ORDER AUTHORIZING SALE OF REAL  
17 PROPERTY OF THE ESTATE [12808  
Greene Avenue, Los Angeles, CA  
90066] FREE AND CLEAR OF LIENS  
18 AND INTERESTS, SUBJECT TO  
HIGHER AND BETTER OFFERS, AND  
19 APPROVING OVERBIDDING  
PROCEDURES; DECLARATIONS OF  
CAROLYN A. DYE AND STEVE MANAVI  
20 IN SUPPORT THEREOF

21 Date: March 29, 2022

22 Time: 11:00 a.m.

23 Place: 255 E. Temple Street

Courtroom 1545

Los Angeles, CA 90012

24  
25  
26 TO THE HONORABLE NEIL W. BASON, UNITED STATES BANKRUPTCY JUDGE, THE  
27 DEBTOR, AND OTHER INTERESTED PARTIES:

28 ///

NOTICE OF TRUSTEE'S MOTION FOR ORDER AUTHORIZING SALE OF REAL PROPERTY OF THE ESTATE [12808 Greene Avenue, Los Angeles, CA 90066] FREE AND CLEAR OF LIENS AND INTERESTS, SUBJECT TO HIGHER AND BETTER OFFERS, AND APPROVING OVERBIDDING PROCEDURES; DECLARATIONS OF CAROLYN A. DYE AND STEVE MANAVI IN SUPPORT THEREOF

1 PLEASE TAKE NOTICE that on the date and at the time and place  
2 referenced above, a hearing will be held before the Honorable Neil  
3 W. Bason, United State Bankruptcy Judge, to consider the Motion of  
4 Carolyn A. Dye, Chapter 7 Trustee ("Trustee") in the above-  
5 captioned case, for an Order Authorizing Sale of Real Property  
6 located at 12808 Greene Ave., Los Angeles, CA 90066, Assessor's  
7 Parcel Number 4223-014-023, Free and Clear of Liens and Interests,  
8 Subject to Higher and Better Offers and Approving Overbidding  
9 Procedures. The Motion is based on the following:

10 Trustee proposes to sell the Property to for the sum of One  
11 Million Three Hundred Fifty Thousand Dollars (\$1,350,000)  
12 ("Purchase Price") The Purchase Price will be paid in one lump sum  
13 by the buyer, Investsocal, LLC and/or assignee (collectively the  
14 "Buyer") at closing. The estate will pay broker's commissions of  
15 five percent (5%) and the usual closing costs estimated at two  
16 percent (2%). Buyer has paid \$40,500 as a deposit into escrow.  
17 Escrow is scheduled to close within 14 days of the date on which  
18 the order approving the sale is entered on the Court's docket. The  
19 sale is "as is, where is" basis. The overbid procedures are as  
20 follows:

21 Minimum Overbids. The initial minimum overbid for the  
22 Property shall be \$10,000 above the present offer and any  
23 subsequent overbids shall be at least \$5,000 over the preceding  
24 offer. (If the Buyer is not the successful overbidder, then it will  
25 receive up to \$5,000 as reimbursement for documented due diligence  
26 and legal expenses from escrow.)

27 b. Minimum Deposits. A minimum deposit of Fifty Thousand  
28 Five Hundred Dollars (\$50,500), which is inclusive of the initial

NOTICE OF TRUSTEE'S MOTION FOR ORDER AUTHORIZING SALE OF REAL PROPERTY OF THE ESTATE [12808 Greene Avenue, Los Angeles, CA 90066] FREE AND CLEAR OF LIENS AND INTERESTS, SUBJECT TO HIGHER AND BETTER OFFERS, AND APPROVING OVERBIDDING PROCEDURES; DECLARATIONS OF CAROLYN A. DYE AND STEVE MANAVI IN SUPPORT THEREOF

1 deposit of Forty Thousand Five Hundred Dollars (\$50,500 and the  
2 initial overbid of Ten Thousand Dollars (\$10,000). The overbid  
3 payment shall be by cashier's check payable to "Carolyn A. Dye ATF  
4 Maureen Redmond," and must accompany any overbid offer for the  
5 Property with evidence of the ability to close the transaction at  
6 the final sales price. In the event the approved Buyer does not  
7 close the transaction, the deposit will be non-refundable if the  
8 overbid is accepted and the sale does not close within fourteen  
9 (14) days of the date on which the Order approving the sale of the  
10 Property is entered by the Court.

11 c. Overbidders are requested to submit to the Trustee, not  
12 later than forty-eight (48) hours before the hearing date, a  
13 cashier's check for the required deposit and evidence of the  
14 ability to close. The Trustee will promptly advise any proposed  
15 overbidder of any disapproval of qualifications, giving the  
16 overbidder an opportunity to correct the deficiency. The Trustee  
17 holds sole discretion in accepting and rejecting all overbids. In  
18 any event, the Trustee may permit a proponent of an overbid to  
19 submit, not later than one hour prior to the date and time of the  
20 hearing on the sale, a cashier's check for Fifty Thousand Five  
21 Hundred Dollars (\$50,500) and evidence of the financial ability to  
22 close escrow within fourteen (14) days of submission of overbid.  
23 This evidence must at a minimum include a demonstration of firm  
24 financing commitment from a recognized lender and/or sufficient  
25 liquid funds on deposit, all to the satisfaction of the Trustee.

26 d. All overbids for the Property must provide for payment of  
27 the entire purchase price at the close of escrow.

28 e. Any overbids shall offer to purchase the Property on a

1 "as-is - where is" basis and shall contain no conditions,  
2 contingencies or addendum in addition to those contained in the  
3 terms agreed to between Trustee and Buyer and presented to this  
4 Court.

5 f. All due diligence investigations shall be conducted prior  
6 to the sale hearing.

7 g. At the conclusion of the hearing on the Motion, the Court  
8 shall determine the highest and best offer for the Property, and  
9 the Trustee shall proceed to consummate the sale of the Property in  
10 accordance with such offer to the highest bidder without further  
11 notice to creditors or hearing before this Court.

12 h. The overbidder's deposit is non-refundable in the event  
13 that Court confirms the sale but, for any reason whatsoever, the  
14 overbidder fails to close the sale timely. The overbidding party  
15 will be bound by all of the terms of sale proposed in this Motion  
16 (as incorporated by reference in the sales contract) except as to  
17 price, without contingencies of any kind, including no financing or  
18 appraisal contingencies, and shall close the escrow no more than  
19 fourteen (14) days after the entry of the order approving the  
20 Motion.

21 i. The Trustee also proposes that the Court confirm a backup  
22 buyer so that, in the event that the successful overbidder does not  
23 close within fourteen (14) days after the entry of the order  
24 approving the Motion, the Trustee may retain the deposit of the  
25 original successful buyer as liquidated damages and sell the  
26 Property to the back-up buyer for the amount of such backup last  
27 bid.

28 j. The Trustee also seeks a ruling that the party to whom the

1 Court confirms the sale and any backup buyers are good faith  
2 purchasers for purposes of 11 U.S.C. Section 363(m).

3 Existing liens, other than the first trust deed, will be  
4 compromised and paid pursuant to a stipulation approved by Order  
5 entered on February 23, 2022 (Docket No. 228), which provides for  
6 the following:

7 After payment of brokerage commissions, costs of sale, accrued  
8 but unpaid property taxes and the first trust deed, the remaining  
9 funds will be distributed as follows:

Creditor/Claimant	Proposed payment
LA County Tax Collector	\$1,867.15 (estimated)
Chapter 7 Estate	\$72,500 (for administrative expenses and general unsecured claims)
First Nationwide-First Trust Deed Holder	\$ 120,815.31 (estimated)
Sulphur Mountain land and Livestock Co., LLC	\$350,000
Lori Haynes	\$270,000
Raymond Aver	\$50,000
Maureen Redmond	Balance of funds estimated to be \$390,317

24  
25 You may request a complete copy of the Motion from the Trustee

26 Carolyn A. Dye (SBN 97527)  
27 15030 Ventura Boulevard,  
Suite 527  
28 Sherman Oaks, California 91403  
Phone: 818/287-7003  
Email: [trustee@cadye.com](mailto:trustee@cadye.com)

NOTICE OF TRUSTEE'S MOTION FOR ORDER AUTHORIZING SALE OF REAL PROPERTY OF THE ESTATE [12808 Greene  
Avenue, Los Angeles, CA 90066] FREE AND CLEAR OF LIENS AND INTERESTS, SUBJECT TO HIGHER AND BETTER  
OFFERS, AND APPROVING OVERBIDDING PROCEDURES; DECLARATIONS OF CAROLYN A. DYE AND STEVE MANAVI  
IN SUPPORT THEREOF

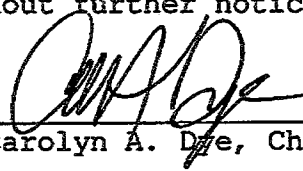


1 A complete copy of the Motion is on file with the Clerk of the  
2 Court and may be viewed at the U.S. Bankruptcy Court, 255 E. Temple  
3 Street, Room 100, Los Angeles, CA 90012.

4 PLEASE TAKE FURTHER NOTICE that any objection to the Motion  
5 or the proposed sale must be made in writing and filed with the  
6 Court no later than fourteen (14) days prior to the date of the  
7 Hearing in conformity with Local Bankruptcy Rule 9013-1(f), and  
8 consist of a written statement of all reasons in opposition, an  
9 answering Memorandum of Points and Authorities, declarations, and  
10 documentary evidence upon which the opposing party intends to rely.

11 PLEASE TAKE FURTHER NOTICE that pursuant to LBR 9013-1(h)  
12 any objection not timely filed and served may be deemed by the  
13 Court to be consent to the relief requested and may result in the  
14 Court's issuance of an order without further notice or hearing.

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16 Dated: March 2, 2022

  
Carolyn A. Dye, Chapter 7 Trustee

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28 Service Date: March 2, 2022

NOTICE OF TRUSTEE'S MOTION FOR ORDER AUTHORIZING SALE OF REAL PROPERTY OF THE ESTATE [12808 Greene Avenue, Los Angeles, CA 90066] FREE AND CLEAR OF LIENS AND INTERESTS, SUBJECT TO HIGHER AND BETTER OFFERS, AND APPROVING OVERBIDDING PROCEDURES; DECLARATIONS OF CAROLYN A. DYE AND STEVE MANAVI IN SUPPORT THEREOF

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 15030 Ventura Boulevard, Suite 527, Sherman Oaks, California 91403.

A true and correct copy of the foregoing document entitled Notice of Trustee's Motion for Order Authorizing Sale of Real Property of the Estate (12808 Greene Avenue, Los Angeles, CA 90066) Free and Clear of Liens and Interests, Subject to Higher and Better Offers, and Approving Overbidding Procedures; Declaration of Carolyn A. Dye and Steve Manavi in Support Thereof will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On March 2, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Raymond H. Aver	ray@averlaw.com, averlawfirm@gmail.com; ani@averlaw.com; katya@averlaw.com
Carolyn A Dye (TR)	trustee@cadye.com, c197@ecfbis.com; atty@cadye.com
Erin M McCartney	bankruptcy@zbslaw.com, emccartney@ecf.courtdrive.com
Richard Miyamoto	rmiyamoto@tmlegal.com
Alan I Nahmias	anahmias@mbn.law, jdale@mbnlawyers.com
Cassandra J Richey	cdcaecf@bdfgroup.com
Edward A Treder	cdcaecf@bdfgroup.com
United States Trustee (LA)	ustpreion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:** On March 2, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

United States Bankruptcy Court  
The Honorable Neil W. Bason  
United States Bankruptcy Court  
255 East Temple Street  
Suite 1552  
Los Angeles, CA 90012

■ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY - N/A.** Pursuant to Fed.R.Civ.P. 5 and/or controlling LBR, on \_\_\_\_\_, I arranged for service on the following person as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 2, 2022

  
Karissa De La Trinidad

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Label Matrix for local noticing  
0973-2  
Case 2:21-bk-10360-NB  
Central District of California  
Los Angeles  
Wed Mar 2 14:47:17 PST 2022

Los Angeles Division  
255 East Temple Street,  
Los Angeles, CA 90012-3332

LEA Accountancy, LLP  
1130 South Flower Street  
Suite 312  
Los Angeles, CA 90015-2143

Bank of America  
P.O. Box 982238  
El Paso, TX 79998-2238

Lori Haynes c/o Eleanor Haynes  
ZBS Law, LLP  
30 Corporate Park, Suite 450  
Irvine, CA 92606-3401

Citimortgage, Inc.  
P.O. Box 10002  
Hagerstown, MD 21747-0002

Claire Redmond  
1-3 Manilla Crescent  
Birnbek Road  
Weston Super Mare, England DS232VS

David Soomakh  
1530 East Dundee Road, #190  
Palatine, IL 60074-8314

Estate of Hans Pensell  
1033 South Carmelina Avenue  
Los Angeles, CA 90049-5809

Franchise Tax Board  
Bankruptcy Unit  
P.O. Box 2952  
Sacramento, CA 95812-2952

Gerald Redmond  
1-3 Manilla Crescent  
Birnbek Road  
Weston Super Mare, England DS232VS

Kennelly & Grossfeld  
420 Sunset Boulevard, Suite 420  
Pacific Palisades, CA 90272

Internal Revenue Service  
300 North Los Angeles Street  
Stop 5027  
Los Angeles, CA 90012-3479

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Jackie Blake  
1928 SE 43rd Avenue  
Portland, OR 97215-3119

James Redmond  
1149 12th Street, #206  
Santa Monica, CA 90403-5426

Jeffrey Cowan  
1541 Ocean Avenue, #200  
Santa Monica, CA 90401-2104

Johanna Redmond  
30856 Agoura Road, Apt. J11  
Agoura Hills, CA 91301-4362

Keynote Consulting  
1530 East Dundee Road, Suite 190  
Palatine, IL 60074-8314

Law Offices of Raymond H. Aver  
A Professional Corporation  
10801 National Boulevard, Suite 100  
Los Angeles, CA 90064-4140

Lori Haynes  
P.O. Box 5442  
Santa Monica, CA 90409-5442

(p) LOS ANGELES COUNTY TREASURER AND TAX COLLE  
ATTN BANKRUPTCY UNIT  
PO BOX 54110  
LOS ANGELES CA 90054-0110

Mark Hennessey  
2818 3rd Street  
Santa Monica, CA 90405-4122

Mr. Cooper  
P.O. Box 818060  
5801 Postal Road  
Cleveland, OH 44181-2184

Mr. Raymond H. Aver  
c/o Law Offices of Raymond H. Aver  
A Professional Corporation  
10800 National Boulevard, Suite 100  
Los Angeles, California 90064  
Attention: Raymond H. Aver, Esquire 90064

Resch, Polster & Berger LLP  
1840 Century Park East, 17th Floor  
Los Angeles, CA 90067-2118

Sea Mist  
1619 Ocean Front Walk  
Santa Monica, CA 90401-3119

Steven Stanley  
1801 Oak Street, #151  
Bakersfield, CA 93301-3007

Sulphur Mountain Land and Livestock  
Co., LLC  
1746-F S. Victoria Avenue, Ste. 201  
Ventura, CA 93003-6592

Tom Moran  
1619 Ocean Front Walk  
Santa Monica, CA 90401-3119

United States Trustee (LA)  
915 Wilshire Blvd, Suite 1850  
Los Angeles, CA 90017-3560

Alan I Nahmias  
Mirman, Berman & Nahmias, LLP  
21860 Burbank Boulevard  
Suite 360  
Woodland Hills, CA 91367-7406

(p)CAROLYN A DYE  
15030 VENTURA BLVD SUITE 527  
SHERMAN OAKS CA 91403-5470

Maureen C. Redmond  
12808 Greene Avenue  
Los Angeles, CA 90066-6410

Raymond H. Aver  
Law Offices of Raymond H. Aver  
A Professional Corporation  
10801 National Boulevard, Suite 100  
Los Angeles, CA 90064-4140

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Los Angeles County Tax Collector  
P.O. Box 54018  
Los Angeles, CA 90051-0110

(d)Los Angeles County Tax Collector  
P.O. Box 54110  
Los Angeles, CA 90051-0110

Carolyn A Dye (TR)  
Law Offices of Carolyn Dye  
15030 Ventura Blvd., Suite 527  
Sherman Oaks, CA 91403

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)COLDWELL BANKER

(u)Courtesy NEF

(u)LEA Accountancy, LLP

(u)Nationstar Mortgage LLC

(u)Sulphur Mountain Land and Livestock Co. LL

End of Label Matrix  
Mailable recipients 34  
Bypassed recipients 5  
Total 39

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 15030 Ventura Boulevard, Suite 527, Sherman Oaks, California 91403.

A true and correct copy of the foregoing document entitled Notice of Sale of the Estate Property will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On March 2, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Raymond H. Aver	ray@averlaw.com, averlawfirm@gmail.com; ani@averlaw.com;
	katya@averlaw.com
Carolyn A Dye (TR)	trustee@cadye.com, c197@ecfbis.com;atty@cadye.com
Erin M McCartney	bankruptcy@zbslaw.com, emccartney@ecf.courtdrive.com
Richard Miyamoto	rmiyamoto@tmlegal.com
Alan I Nahmias	anahmias@mbn.law, jdale@mbnlawyers.com
Cassandra J Richey	cdcaecf@bdfgroup.com
Edward A Treder	cdcaecf@bdfgroup.com
United States Trustee (LA)	ustpreion16.la.ecf@usdoj.gov

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United States Bankruptcy Court	Maureen C. Redmond
The Honorable Neil W. Bason	12808 Greene Avenue
United States Bankruptcy Court	Los Angeles, CA 90066
255 East Temple Street	
Suite 1552	
Los Angeles, CA 90012	

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY - N/A.** Pursuant to Fed.R.Civ.P. 5 and/or controlling LBR, on \_\_\_\_\_, I arranged for service on the following person as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 2, 2022

  
Karissa De La Trinidad